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DIVERSE. INDEPENDENT. LOCAL

August 7, 2013

Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video  
Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed  
Rulemaking (FCC 13-77)*

Dear Commissioners:

Portland Community Media (PCM) submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Telecommunications Officers and Advisors and the US Conference of Mayors.

PCM provides public, education and government access on six channels in Portland, Oregon, with a potential audience of approximately 380,000 households. PCM cablecasts over 600 hours of locally produced and local interest programming each week.

PCM produces and cablecasts numerous local government meetings, and programs such as *Classic Arts Showcase* and *NASA*, which include closed captioning. The onscreen video programming guide of our multichannel video-programming distributor (MVPD), Comcast, does not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, Comcast usually only provides generic information about these programs. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the video programming guide whether our programs are accessible, which means viewers with visual or auditory disabilities cannot make meaningful video programming choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information to include high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,

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